

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
FORT LAUDERDALE DIVISION**

CHRISTOPHER RATCLIFF,  
individually and on behalf of all  
those similarly situated,

Plaintiff,

Case No. \_\_\_\_\_

v.

TRANSWORLD SYSTEMS INC.,

Defendant.

**NOTICE OF REMOVAL**

Pursuant to 28 U.S.C. §§ 1331, 1367, 1441, and 1446, defendant, Transworld Systems Inc. (TSI), through undersigned counsel, hereby removes the above-captioned civil action from the County Court of the Seventeenth Judicial Circuit, in and for Broward County, Florida, to the United States District Court for the Southern District of Florida, Fort Lauderdale Division. The removal of this civil case is proper because:

1. TSI is a named defendant in this civil action filed by plaintiff, Christopher Ratcliff (plaintiff), in the County Court of the Seventeenth Judicial Circuit, in and for Broward County, Florida, titled *Christopher Ratcliff, individually and on behalf of all those similarly situated v. Transworld Systems Inc.*, Case No. CACE22005876 (hereinafter the “State Court Action”).

2. TSI removes this case on the basis of the Fair Debt Collection Practices Act (FDCPA), 15 U.S.C. § 1692, *et seq.*, as plaintiff's complaint claims relief based on alleged practices in violation of federal law.

3. Pursuant to 28 U.S.C. § 1446(b), TSI has timely filed this Notice of Removal. TSI was served with plaintiff's complaint on April 27, 2022. This Notice of Removal is filed within 30 days of receipt of the complaint.

4. Attached hereto as **Exhibit A** and incorporated by reference as part of the Notice of Removal are true and correct copies of the process and pleadings in the State Court Action. No further proceedings have taken place in the State Court Action.

5. A copy of this Notice of Removal is being served upon plaintiff and filed concurrently with the County Court of Seventeenth Judicial Circuit, in and for Broward County, Florida.

WHEREFORE, defendant, Transworld Systems Inc., hereby removes to this Court the State Court Action.

Dated: May 17, 2022

Respectfully Submitted,

/s /Ashley Wydro  
Ashley Wydro, Esq.  
Florida Bar No. 0106605  
Dayle M. Van Hoose, Esq.  
Florida Bar No. 0016277  
SESSIONS, ISRAEL & SHARTLE, L.L.C.  
3350 Buschwood Park Drive, Suite 195  
Tampa, Florida 33618  
Telephone: (813) 440-5327  
Facsimile: (877) 334-0661  
awydro@sessions.legal  
dvanhoose@sessions.legal

*Counsel for Defendant,  
Transworld Systems Inc.*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on May 17, 2022, a copy of the foregoing was filed electronically via CM/ECF system. Notice of this filing will be sent to the parties of record by operation of the Court's electronic filing system, including plaintiff's counsel as described below.

Jibrael S. Hindi, Esq.  
Thomas J. Patti, Esq.  
Jennifer G. Simil, Esq.  
The Law Offices of Jibrael S. Hindi  
110 SE 6<sup>th</sup> Street, Suite 1744  
Fort Lauderdale, FL 33301  
jibrael@jibraellaw.com  
tom@jibraellaw.com  
jen@jibraellaw.com

/s/ Ashley Wydro

Attorney